

*Curling, et al. v. Kemp, et al.*

**EXHIBIT B**

Table

20180613 schedule proposed by coalition plaintiffs.docx

**Schedule Proposed by Coalition Plaintiffs:**

<b><u>Date</u></b>	<b><u>Mots. to Dismiss</u></b> <b><u>("MTDs")</u></b>	<b><u>Expedited Discovery</u></b>	<b><u>Mot. Prelim. Inj.</u></b> <b><u>("MPI")</u></b>
Weds., June 13	Coalition Pls.' TAC docketed.		
Friday., June 22 3 p.m. Eastern	Def's. serve a <b>Joint Notice of Intent</b> indicating whether any intends to raise a Rule 11(b)(1)-compliant, non-frivolous sovereign-immunity defense to Coalition Pls.'s TAC (or to Curling Pls.' SAC in light of Curling Pls.' consent to Rule 12 dismissals of certain claims per Defs.' pending motions to dismiss.)	<p><b><i>Expedited discovery</i></b> opens, unless intent to raise a Rule 11(b)(1)-compliant, non-frivolous sovereign-immunity defense is noticed.</p> <ul style="list-style-type: none"> <li>• <b>Rules 31, 33, 34, 36 &amp; 45:</b> Objections due in 7 days instead of 30, responses due in 14 days instead of 30.</li> <li>• Remotely conducted depositions allowed at request of noticing party (without prejudice to the right of any other party to participate in person at any such deposition).</li> <li>• <b>Rule 30(b)(6):</b> Topic objections due in 7 days.</li> </ul>	
Mon., June 25	MTDs due.		
Weds., June 27		Rule 26(a)(1) initial disclosures due from both sides.	

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Mon., July 9	Consolidated Response by Coalition Pls. to MTDs due.		
Mon., July 16	(Optional) Replies in support of each MTD due from Defs.		
Mon.–Fri., July 16–20		Depositions to occur.	
Mon., July 23			Pls.' respective MPIs aimed at November 2018 election due.
Mon.–Fri., July 23–27		Depositions to occur.	
Mon–Fri, July 30–Aug 3		Depositions to occur.	
Mon., Aug. 6			Defs.' Consolidated Response to each MPI due.

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<b><u>Date</u></b>	<b><u>Mots. to Dismiss</u></b> <b><u>(“MTDs”)</u></b>	<b><u>Expedited Discovery</u></b>	<b><u>Mot. Prelim. Inj.</u></b> <b><u>(“MPI”)</u></b>
Friday, Aug 10			(Optional) Pls.’ respective replies in support of each MPI due.
At Court’s availability in August			MPI Hearing (3–5 days)
Friday, Sept 14  <i>[30 days before early voting starts]</i>			Target deadline for implementation of Preliminary Injunction, if MPI granted.
Monday, Oct 15  <i>[Early voting starts in small number of locations]</i>			
Tuesday, Nov. 6  <i>[Election Day]</i>			